

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: :
Bige Monyea Chambers : Bankruptcy No. 24-10788-AMC
Debtor. :
Ally Bank :
Respondent :
:

**ANSWER OF ALLY BANK TO DEBTOR'S MOTION to DETERMINE VALUE
OF PROPERTY**

Ally Bank, by and through its attorneys, Lavin, Cedrone, Graver, Boyd & DiSipio, files this Answer to Debtor's Motion to Determine Value of Property and states:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied as conclusions of law.
5. Denied. It is specifically denied that the value of the Vehicle is \$20,930. Exhibit B is a

document which speaks for itself, no admissions are made nor intended as to Exhibit B.

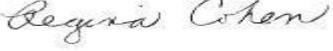
By way of further answer, the Vehicle has a retail value of \$40,800. See Exhibit 1. Thus Ally Bank is entitled to receive its payoff of \$33,985.40, which is lower than the value of the Vehicle.

6. Denied. It is specifically denied that the value of the Vehicle is \$20,930. By way of further answer, the Vehicle has a retail value of \$40,800. See Exhibit 1. Thus Ally Bank is entitled to receive its payoff of \$33,985.40, which is lower than the value of the Vehicle.
7. Denied as conclusions of law. By way of further answer, as to interest Ally Bank is entitled to the prime rate as of the petition date of 8% plus a 2% risk adjustment. Ally Bank relies upon *In re Till*.

Respectfully submitted,

LAVIN, CEDRONE, GRAVER, BOYD & DiSIPIO

DATED: 12/16/2024

By: 

Regina Cohen
Suite 500 190 North Independence Mall West
6th & Race Streets
Philadelphia, PA 19106
(215) 351-7551
Attorneys for Ally Bank